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AUG 0 1 2014

July 31, 2014

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Hon. George B. Daniels
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, New York 10007-1312

Laydon v. Mizuho Bank, Ltd. et al., No. 1:12-cv-03419-GBD

Dear Judge Daniels:

Re:

We represent the HSBC Defendants in the above-referenced action. We write on behalf of the Defendants to request a 4-day extension for the parties to file the Joint Discovery Plan and proposed Protective Order. The current deadline to file these documents is July 31, 2014, and the new deadline would be August 4, 2014. No prior requests for an extension of this deadline have been made, counsel for Plaintiff is not opposed to this request, and granting this extension should not affect any other dates set by the Court.

The basis for this request is to give the Defendants additional time to coordinate their response to proposed edits to the most recent revised draft Discovery Plan provided by the Plaintiff, and to give the parties some additional time to try to reach agreement on as many issues as possible. With respect to the proposed Protective Order, outside counsel for the parties have just reached an agreement in principal on a proposed order, but the agreement is subject to review and approval by our clients.

Accordingly, Defendants' request the Court's approval by endorsement of the 4-day extension requested above. Thank you for your attention to this letter. If you have any questions or need anything further, please let me know.

Respectfully.

Gregory T. Casamento

Counsel for HSBC Defendants

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cc: All Counsel of Record (by email)